

TO: Mail Stop 8 Director of the U.S. Patent & Trademark Office P.O. Box 1450 Alexandria, VA 22313-1450	REPORT ON THE FILING OR DETERMINATION OF AN ACTION REGARDING A PATENT OR TRADEMARK
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In Compliance with 35 § 290 and/or 15 U.S.C. § 1116 you are hereby advised that a court action has been
 filed in the U.S. District Court Northern District of California on the following ☒ Patents or ☐ Trademarks:

DOCKET NO. CV 08-00840 EMC	DATE FILED 2/6/08	U.S. DISTRICT COURT 450 Golden Gate Avenue, P.O. Box 36060, San Francisco, CA 94102
PLAINTIFF ADVENTURE MEXICAN INSURANCE SERVICE, INC.,		DEFENDANT INTERNATIONAL INSURANCE GROUP, INC., ET AL.
PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK
1 see Complaint		
2 7,240,017		
3		
4		
5		

In the above—entitled case, the following patent(s) have been included:

DATE INCLUDED	INCLUDED BY <input type="checkbox"/> Amendment <input type="checkbox"/> Answer <input type="checkbox"/> Cross Bill <input type="checkbox"/> Other Pleading	
PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK
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In the above—entitled case, the following decision has been rendered or judgement issued:

DECISION/JUDGEMENT

CLERK Richard W. Wieking	(BY) DEPUTY CLERK Sheila Rash	DATE February 11, 2008
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Copy 1—Upon initiation of action, mail this copy to Commissioner Copy 3—Upon termination of action, mail this copy to Commissioner
 Copy 2—Upon filing document adding patent(s), mail this copy to Commissioner Copy 4—Case file copy

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17 UNITED STATES DISTRICT COURT
18 FOR THE NORTHERN DISTRICT OF CALIFORNIA

19 ADVENTURE MEXICAN INSURANCE
20 SERVICES, INC., a California corporation,

21 Plaintiff,

22 vs.

23 INTERNATIONAL INSURANCE GROUP,
24 INC., an Arizona corporation, DBA MEXICO
25 & RV INSURANCE SERVICES

26 Defendant.

Case No.:

C08 00840 EMC

**COMPLAINT FOR DECLARATORY
JUDGMENT OF PATENT NON-
INFRINGEMENT AND INVALIDITY**

DEMAND FOR JURY TRIAL

1
2 **PARTIES, JURISDICTION, AND VENUE**

3 1. Plaintiff Adventure Mexican Insurance Services, Incorporated ('AMIS') is a
4 corporation organized under the laws of the state of California, with a principal place of business
5 in Soquel, California.

6 2. AMIS is in the business of selling Mexican auto insurance to non-Mexican
7 residents via its websites including www.mexadventure.com.

8 3. On information and belief, defendant International Insurance Group, Inc. ('IIG') is a
9 corporation organized under the laws of Arizona, and has a principal place of business at 121 E.
10 Birch Avenue, Suite #207, in Flagstaff, AZ 86001.

11 4. On information and belief, IIG is affiliated with and owns Mexico Insurance
12 Professionals, a company whose principal place of business is the same building, with the same
13 address, as IIG.

14 5. On information and belief, IIG does business in California under the DBA 'Mexico
15 & RV Insurance Services,' CA License #OA99044.

16 6. On information and belief, IIG, its affiliate Mexico Insurance Professionals, and
17 their associated companies do business within California, and have otherwise purposefully availed
18 itself of the laws of California, including this District.

19 7. IIG has purposefully directed its patent infringement allegations and threats against
20 AMIS, a resident of this District, knowing that AMIS was a resident of this District and knowing
21 that at least some of the business activities of AMIS that it was challenging were transacted in and
22 from this District.

23 8. On information and belief, IIG is the current assignee and owner of United States
24 Patent No. 7,240,017 ('the '017 patent,' or 'patent in suit'), which issued on July 3, 2007, a true copy
25 of which is attached as Exhibit A. True ownership of the patent in suit has not been determined,
26 but on information and belief, records at the United States Patent and Trademark Office reflect that
27 IIG is the current assignee of the patent in suit.
28

1 9. This action arises under the patent laws of the United States (Title 35 of the United
2 States Code).

3 10. This Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1338(a) and
4 2201-02.

5 11. Venue in this district is proper pursuant to 28 U.S.C. §§ 1391(b)-(c), 1400(b),
6 because IIG does business in the Northern District of California, and therefore is a resident of this
7 District for venue purposes.

8 12. There exists a case of actual controversy between AMIS and IIG regarding the
9 alleged infringement of the '017 patent. Actions by IIG have caused and created an actual,
10 immediate and substantial controversy between the parties, regarding the issue of non-
11 infringement of any valid claim of the patent in suit.

12 13. In particular, while the patent application corresponding to the '017 patent was still
13 pending before the U.S. Patent and Trademark Office, IIG filed a 'Petition to Make Special' alleging
14 actual infringement by AMIS websites www.mexadventure.com and
15 www.discoverbajaonline.com. A true copy of the petition is attached as Exhibit B.

16
17 **COUNT 1: DECLARATION OF PATENT NON-INFRINGEMENT**

18 14. Paragraphs (1) through (13) are incorporated by reference herein.

19 15. On information and belief, IIG owns the '017 patent.

20 16. AMIS has never infringed and does not currently infringe any valid claim of the
21 '017 patent.

22 17. AMIS is entitled to a declaration that it does not infringe any valid claim of the '017
23 patent.

24
25 **COUNT TWO: DECLARATION OF PATENT INVALIDITY**

26 18. Paragraphs (1) through (13) are incorporated by reference herein.

27 19. Actions by IIG have caused and created an actual controversy between the parties,
28 regarding the issue of whether the '017 patent is valid.

1 20. One or more claims of the '017 patent is invalid for failure to meet the conditions of
2 patentability of 35 U.S.C. § 101 et seq., including without limitation those of sections 102, 103,
3 and 112.

4 21. AMIS is entitled to a declaration that one or more claims of the '017 patent is
5 invalid.

6
7 **PRAYER FOR RELIEF**

8 WHEREFORE, AMIS requests:

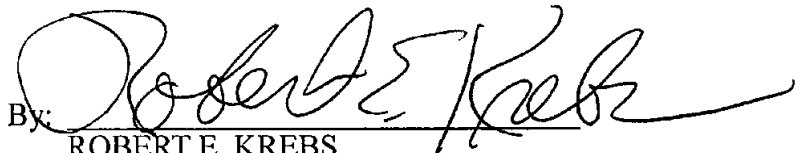
- 9 A. a declaration that AMIS has not infringed any valid claim of the '017 patent;
10 B. a declaration that IIG and each of its officers, employees, agents, alter egos,
11 attorneys, and any persons in active concert or participation with it be restrained and enjoined
12 from further prosecuting or instituting any action against AMIS claiming that the '017 patent is
13 infringed, or from representing that the products or services provided by AMIS, or use of those
14 products or services by others, infringe the '017 patent.
15 C. an award to AMIS of reasonable attorneys' fees under 35 U.S.C. § 285; and
16 D. such other relief as the Court deems just and proper.

17
18 **JURY DEMAND**

19 AMIS demands a trial by jury on all issues so triable.

20 Dated: February 6, 2008

THELEN REID BROWN RAYSMAN & STEINER

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22 By: 

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